

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD COLLINS,	:	CIVIL ACTION
Plaintiff	:	
vs.	:	
	:	
CITY OF PHILADELPHIA, et al.	:	No. 2:16-CV-05671
Defendants	:	

JOINT STATUS REPORT PURSUANT TO RULE 26(f)

Basis of Jurisdiction:

This action is brought pursuant to 42 U.S.C.A. §§ 1983 and 1988 and the Fourth, Fifth, and Fourteenth Amendments to the United States Constitution. Jurisdiction is founded upon 28 U.S.C.A. §§ 1331 and 1343.

Trial: Jury Trial

Plaintiff's counsel participating in the Rule 16 Conference: Michael I. McDermott, Esquire

Defendant's counsel participating in the Rule 16 Conference: Aaron Shotland, Esquire

Do counsel have full authority to settle at a Rule 16 Conference?: Yes.

When did the parties hold the Rule 26 Conference?

November 22, 2016.

When did the parties comply with Rule 26(a)'s duty of self-executing disclosure?

Plaintiff's counsel complied on November 23, 2016.

Defense counsel will comply before January 5, 2017.

Does either side expect to file a case-dispositive motion? (yes/no)?

Yes.

If yes, under what Rule?

Defendants intend to file a Motion for Summary Judgement pursuant to Rule 56.

If yes, specify the issue Proposed deadline for filing dispositive motions:

Within Thirty (30) days of the close of discovery.

Does either side anticipate the use of experts?

Neither counsel anticipate presenting expert testimony. Both counsel intend to make a final determination prior to the January 5, 2017 conference.

If yes, what is the proposed deadline for expert discovery?

Plaintiff's Expert Report: April 5, 2017

Defendant's Expert Report: May 5, 2017

Approximate date case should be trial-ready: August 1, 2017

Time for Plaintiff's case: 2 days

Time for Defendants' case: 2 days

Is a settlement conference likely to be helpful? Yes.

If so, when: Early (yes/no) After Discovery (yes/no)

What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for final disposition? Counsel have no objection.

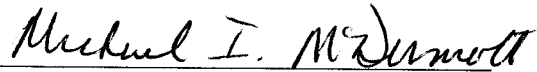
Plan for Discovery:

1. The parties anticipate that discovery should be completed within days. Ninety (90) of the January 5, 2017 conference, April 5, 2017.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? April 5, 2017
3. Have the parties discussed issues relating to claims of privilege or of protection as trial preparation material, as required by Rule 26(f)(3)(D)? Yes.
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. None.

5. If you contend the discovery period should exceed 90 days, please state reason: N/A.

Respectfully submitted:

Date: 11/23/16

A handwritten signature in black ink that reads "Michael I. McDermott". The signature is written in a cursive style with a horizontal line underneath.

Michael I. McDermott, Esquire

Identification No. 52917

1026 Winter Street -Suite 200

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(215) 925-9732

Attorney for Plaintiff,

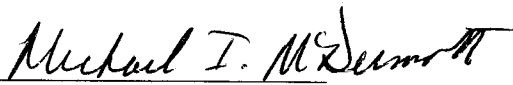
Richard Collins

PROOF OF SERVICE

I hereby certify that on November 23, 2016 a copy of the foregoing was filed electronically. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the court's system:

Service by electronic filing to:

Aaron Shotland, Esquire
Deputy City Solicitor
City of Philadelphia, Law Department
Civil Rights unit
1515 Arch Street, 14th Floor
Philadelphia, PA 19102


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Date: 11/23/16